

LAW FIRM OF BRIAN W. HOFMEISTER, LLC
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Attorneys for Debtor

In the Matter of:) UNITED STATES BANKRUPTCY COURT
AMERICAN BOYCHOIR SCHOOL) FOR THE DISTRICT OF NEW JERSEY
)
Debtor.) CASE NO. 15-16475
)
) CHAPTER 11
)
) RETURN DATE:
) Oral Argument: Required
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)
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)

NOTICE OF MOTION FOR AN ORDER; (i) AUTHORIZING DEBTOR TO (A) SATISFY , AND, TO THE EXTENT APPLICABLE, DIRECTING PAYROLL COMPANY TO HONOR, PRE-PETITION GROSS SALARIES, PAYROLL TAXES AND RELATED EMPLOYEE BENEFIT OBLIGATIONS TO THE DEBTOR'S EMPLOYEES AND (B) TO HONOR, IN THEIR DISCRETION, PRE-PETITION SICK, VACATION AND PERSONAL DAYS; AND (ii) GRANTING RELATED RELIEF

United States Trustee Office
One Newark Center
Suite 2100
Newark, NJ 07102

Attorney General of New Jersey
25 Market Street
Trenton, NJ 08625

State of New Jersey
Division of Taxation
Bankruptcy Section
PO Box 245
Trenton, NJ 08646-0245

US Attorney General
970 Broad Street, Room 700
Newark, NJ 07102

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

PLEASE TAKE NOTICE that the undersigned, attorneys for Debtor, American Boychoir

School ("Debtor") herein, shall appear before the Honorable _____, Judge, United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey, on the 14th day of April, 2015 at 10:00 in the forenoon, or as soon thereafter as counsel may be heard and shall apply for an Order: (i) authorizing Debtor to (A) Satisfy, and, to the extent applicable, directing payroll company to honor, pre-petition gross salaries, payroll taxes and related employee benefit obligations to the Debtor's employees and (B) to honor, in their discretion, pre-petition sick, vacation and personal days; and (ii) granting other relief.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this case. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE that, if you do not want the Court to enter an Order: (i) authorizing Debtor to (A) Satisfy, and, to the extent applicable, directing payroll company to honor, pre-petition gross salaries, payroll taxes and related employee benefit obligations to the Debtor's employees and (B) to honor, in their discretion, pre-petition sick, vacation and personal days; and (ii) granting other relief, or if you want the Court to consider your views on this Motion, then on or before April 14, 2015, you or your attorney must:

File, with the Court, a written objection to this Motion, explaining your position to the Clerk, United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608;

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before April 14, 2015. You must also mail a copy to Brian W. Hofmeister, Esq., Law Firm of Brian W. Hofmeister, LLC, 691 State Highway 33, Trenton, New Jersey 08619; and

You must attend the hearing scheduled to be held on April 14, 2015 at 10:00 a.m. 402 East State Street, Trenton, New Jersey.

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the

Court may decide that you do not oppose the relief sought in this Motion and may enter an order granting the relief requested.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the annexed Application. In addition, if objections are submitted, the undersigned will be appearing for oral argument at the hearing.

PLEASE TAKE FURTHER NOTICE that since the within Motion requests that the Court enter an Order: (i) authorizing Debtor to (A) Satisfy, and, to the extent applicable, directing payroll company to honor, pre-petition gross salaries, payroll taxes and related employee benefit obligations to the Debtor's employees and (B) to honor, in their discretion, pre-petition sick, vacation and personal days; and (ii) granting other relief, and said Motion is based largely on the facts as outlined in the Verified Application in support of the within Motion, it is respectfully submitted that since this Motion does not present complicated questions of fact or unique questions of law, no brief is necessary to assist the Court in its consideration of this Motion.

LAW FIRM OF BRIAN W. HOFMEISTER, LLC
Attorneys for Debtor, American Boychoir School

BY: /s/Brian W. Hofmeister
Brian W. Hofmeister

Dated: April 10, 2015